| 1 2                                     | PATRICK D. ROBBINS (CABN 152288)<br>Attorney for the United States<br>Acting Under Authority Conferred by 28 U.S.C.   | § 515  |  |  |
|---|---|--|--|--|
| 3                                       | MARTHA BOERSCH (CABN 126569)<br>Chief, Criminal Division  |  |  |  |
| <ul><li>4</li><li>5</li><li>6</li></ul> | ROBERT S. LEACH (CABN 196191)<br>ADAM A. REEVES (NYBN 2363877)<br>KRISTINA N. GREEN (NYBN 5226204)<br>ZACHARY G.F. ABRAHAMSON (CABN 310951)   |  |  |  |
| 7                                       | Assistant United States Attorneys 450 Golden Gate Avenue, Box 36055   |  |  |  |
| 8                                       | San Francisco, California 94102-3495<br>Telephone: (415) 436-7014<br>Fax: (415) 436-7234  |  |  |  |
| 10                                      | Email: Robert.Leach@usdoj.gov  Attorneys for United States of America   |  |  |  |
| 11                                      | UNITED STATES DISTRICT COURT  |  |  |  |
| 12                                      | NORTHERN DISTRICT OF CALIFORNIA   |  |  |  |
| 13<br>14                                | SAN FRAN  | ICISCO DIVISION  |  |  |
| 15                                      | UNITED STATES OF AMERICA,   | ) Case No. CR 18-577 CRB   |  |  |
| 16                                      | Plaintiff,  | ) ) DECLARATION OF ZACHARY G.F. ) ABRAHAMSON IN SUPPORT OF UNITED      |  |  |
| 17                                      | v.  | ) STATES' MOTION IN LIMINE TO ADMIT<br>) HOGENSON SETTLEMENT AGREEMENT |  |  |
| 18                                      | MICHAEL RICHARD LYNCH and STEPHEN KEITH CHAMBERLAIN,  | )<br>)   |  |  |
| 19<br>20                                | Defendant.  | )<br>)<br>)  |  |  |
| 21                                      |   | ,  |  |  |
| 22                                      | I, Zachary G.F. Abrahamson, declare as follows:   |  |  |  |
| 23                                      | 1. I am a Special Assistant United States Attorney with the United States Attorney's Office for   |  |  |  |
| 24                                      | the Northern District of California ("USAO"). I am assigned to the prosecution of the above-  |  |  |  |
| 25                                      | referenced case. I make this declaration in support of the United States' Motion in Limine to   |  |  |  |
| 26                                      | Admit Hogenson Settlement Agreement. The statements herein are based in part on persona knowledge and in part on information and belief from my review of documents in this matter. |  |  |  |
| 27                                      | and my discussions with counsel for the government, law enforcement agents, and others.   |  |  |  |
| 28                                      | ·   |  |  |  |

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| 1  | 2.  | . Attached hereto as Exhibit A is a true and correct copy of Trial Exhibit 13037, which     |          |
| 2  |     | contains a June 22, 2010 e-mail from Brent Hogenson to defendant Michael Lynch.             |          |
| 3  | 3.  | Attached hereto as Exhibit B is a true and correct copy of Trial Exhibit 1012, a July 2     | 6, 2010  |
| 4  |     | e-mail from Brent Hogenson to the Financial Services Authority.                             |          |
| 5  | 4.  | Attached hereto as Exhibit C is a true and correct copy of Trial Exhibit 10350, a July      | 28,      |
| 6  |     | 2010 e-mail from Sushovan Hussain to defendant Michael Lynch and Andrew Kanter              | ·.       |
| 7  | 5.  | . Attached hereto as Exhibit D is a true and correct copy of Trial Exhibit 10479, an Aug    | gust 5,  |
| 8  |     | 2010 e-mail from Andrew Kanter to defendant Michael Lynch.                                  |          |
| 9  | 6.  | . Attached hereto as Exhibit E is a true and correct copy of Trial Exhibit 6256, an Augu    | ıst 20,  |
| 10 |     | 2010 e-mail from Brent Hogenson to the Securities and Exchange Commission.                  |          |
| 11 | 7.  | . Attached hereto as Exhibit F is a true and correct copy of Trial Exhibit 4150, a draft n  | notion   |
| 12 |     | to compel arbitration prepared by attorneys for Autonomy.                                   |          |
| 13 | 8.  | . Attached hereto as Exhibit G is a true and correct copy of Trial Exhibit 13059, a Nove    | ember    |
| 14 |     | 19, 2010 settlement agreement between Brent Hogenson and Autonomy.                          |          |
| 15 | 9.  | Attached hereto as Exhibit H is a true and correct copy of Trial Exhibit 13058, a Nove      | ember    |
| 16 |     | 18, 2010 declaration executed by Brent Hogenson.  |          |
| 17 | I d | declare, under penalty of perjury, that the foregoing is true and correct. Executed this 30 | th day   |
| 18 | of  | f March 2024.   |          |
| 19 |     | /s/   |          |
| 20 |     | ZACHARY G.F. ABRAHAN<br>Special Assistant U.S. Attorn                                       |          |
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